

## REMARKS

Claims 8, 16, and 18 are pending in the present application.

Claims 8, 16 and 18 stand rejected under 35 USC § 102(e) as being anticipated by Matos (US 7,277,752) (Matos).

Applicant respectfully traverses the rejections of the pending claims.

**Claim 8** is directed to a method of providing voice instructions to a user for operating an external defibrillator device comprised of at least one set of electrodes couplable to a patient, said method comprising the steps of: transmitting over a wireless protocol a voice prompt instructing the user to attach the set of electrodes to the patient; checking the impedance of the at least one pair of electrodes, and prompting the user over the wireless protocol with a voice prompt if the electrodes are not properly attached; transmitting over the wireless protocol at least one additional voice prompt instructing the user by explaining how to administer defibrillator therapy; and transmitting the voice prompts to a receiver embedded in a portable device, said portable device being selected from the group consisting of a headphone, wireless telephone and a PDA.

Matos is directed to a system and method for monitoring and controlling the therapy of a cardiac rhythm abnormality victim at a remote site by providing immediate access to a medical professional at a central station. See, Matos, Abstract. At column 13, lines 37-52, Matos discloses that a voice communication is made available between the portable unit (defibrillator) and a central station. Advantageously, the words spoken by the medical professional are displayed as text on the portable unit so that the enabler may see as well as hear the instructions given. A video link is also desirable and, in accordance with a preferred feature of the invention, the medical professional at the central station is provided with a device for remotely controlling the orientation of a video camera on the portable unit, so that the medical professional may best see the enabler, the victim and even the portable unit itself. To facilitate hands-free voice communication with the enabler at the remote site, the portable unit is preferably provided with a microphone and loudspeaker, and with a headset which contains earphone and microphone.

Applicant respectfully submits that Matos does not teach or suggest all of the limitations of claim 8. As noted above, claim 8 is directed to, in part, transmitting voice prompts to a receiver embedded in a portable device. Matos, by contrast,

teaches a wireless communication of information from medical personnel at a central station. In light of the foregoing, Applicant respectfully requests reconsideration and withdrawal of the rejection of claim 8.

**Claim 16** is directed to a method for providing voice instructions to a user for operating an external defibrillator device comprised of at least one set of electrodes couplable to a patient, said method comprising the steps of: transmitting over a wireless protocol a voice prompt instructing the user to attach the set of electrodes to the patient; checking the impedance of the at least one pair of electrodes, and prompting the user over the wireless protocol with an audio prompt if the electrodes are not properly attached; and transmitting over the wireless protocol at least one additional voice prompt instructing the user by explaining how to administer defibrillator therapy; wherein the voice prompt instructs the user that a patient assessment is beginning.

As with claim 8, Applicant respectfully submits that Matos does not teach or suggest all of the limitations of claim 16. As noted above, claim 16 is directed to, in part, transmitting voice prompts over a wireless protocol. Matos, by contrast, teaches a wireless communication of information from medical personnel at a central station. In light of the foregoing, Applicant respectfully requests reconsideration and withdrawal of the rejection of claim 16.

**Claim 18** is directed to an electro therapy device comprising: a controller; an energy source; at least one electrode for providing electrotherapy to a patient; an energy delivery system operable by the controller to deliver an electrical shock from the energy source to the at least one electrode; a voice circuit for generating audio prompts initiated by the controller; a wireless transmitter coupled to the voice circuit for transmitting the audio prompts over a wireless communication protocol, the wireless transmitter transmits the audio prompt over the wireless protocol to the user; a portable device including a headphone, the portable device having a wireless receiver embedded therein, said wireless receiver operating in accordance with the wireless communication protocol over which the wireless transmitter operates.

As with claims 8 and 16, Applicant respectfully submits that Matos does not teach or suggest all of the limitations of claim 16. Claim 18 is directed to, in part, an electrotherapy device comprising voice circuit for generating audio prompts initiated by a controller and a wireless transmitter coupled to the voice circuit for transmitting the audio prompts over a wireless protocol to a user. Matos, by contrast,

teaches a wireless communication of information from medical personnel at a central station. In light of the foregoing, Applicant respectfully requests reconsideration and withdrawal of the rejection of claim 18.

### **CONCLUSION**

For the reasons set forth above, it is submitted that claims 8, 16 and 18 distinguish patentably over the references of record and meet all statutory requirements. An early allowance of all claims is requested.

If any extensions of time are necessary in connection with this Response E, Applicant hereby petitions for such extension. If any fees are due in connection with this Response E, the authorization to charge deposit account 14-1270 for the fees associated therewith is hereby provided.

Respectfully submitted,

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